

February 14, 2014

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation

GN Docket No. 13-185, *Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands*
WT Docket No. 12-269, *Policies Regarding Mobile Spectrum Holdings*
GN Docket No. 12-268, *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*

Dear Ms. Dortch:

On February 12, 2014, Kathleen Ham, Steve Sharkey and Chris Wieczorek of T-Mobile US, Inc. ("T-Mobile"), and the undersigned counsel conducted separate meetings with the staffs of the Wireless Telecommunications Bureau and Office of Engineering and Technology shown on the attached list.

The attached presentation was distributed and highlights the points that the T-Mobile representatives made. In particular, we noted the importance of potential bidders securing information regarding incumbent operations in the AWS-3 bands, T-Mobile's preference for a mix of Economic Area ("EA") and Cellular Market Area ("CMA") licenses, the importance of technical rules that conform with those applicable to AWS-1 spectrum, the need to account for incumbent areas of operation in substantial service obligations, and the benefit of interoperability between AWS-1 spectrum and the AWS-3 bands 2155-2180/1755-1780 MHz. We also discussed the relationship between the mobile spectrum holdings proceeding and the auction of AWS-3 and 600 MHz spectrum.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter and the attachments are being filed for inclusion in the above-referenced dockets. Copies of this letter and the attachments are being provided to all Commission employees who attended the meeting. Please direct any questions regarding this filing to the undersigned.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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Very truly yours,

/s/ Russell H. Fox

Russell H. Fox
Counsel for T-Mobile US, Inc.

Attachments

cc: FCC employees shown on the attached list, with attachments (via e-mail)

**MEETING ATTENDEES
T-MOBILE USA, INC.
FEBRUARY 12, 2014**

WIRELESS TELECOMMUNICATIONS BUREAU MEETING ATTENDEES

Roger Sherman
John Leibovitz
Blaise Scinto
Janet Young
Brian Regan
Peter Daronco
Nancy Zaczek

OFFICE OF ENGINEERING AND TECHNOLOGIES MEETING ATTENDEES

Julius Knapp
Ronald Repasi (by telephone)
Matthew Hussey
Walter Johnston
Michael Ha



Topics

AWS-3 and 1755-1780 MHz

- Proposed Band Plan
- Transition Planning and Federal Coordination
- Technical Rules
- License Size



Proposed Band Plan for AWS-3 Extension of AWS-1

G CM A	H CM A	I EA	J EA	K EA	
2155	2160	2165	2170	2175	2180
M	M	M	M	M	M
Hz	Hz	Hz	Hz	Hz	Hz

Transition Planning and Federal Coordination

- Transparency and flexibility needed to make the AWS-3 and 1755-80 MHz auction successful
 - Potential bidders should have access to all relevant federal transition plan information with sufficient time to form their bidding strategies
- The Commission should adopt flexible coordination zones rather than fixed exclusion zones
 - T-Mobile successfully coordinated with DoD and other federal users in the AWS-1 context
 - Coordination will depend upon the type of system, the location, and the nature of use
- The information from the CSMAC working groups is a good start but is overly conservative and does not provide definitive coordination information

Technical Rules

- The FCC should not adopt the proposed EIRP limitation of 20 dBm for the 1755-1780 MHz portion of the band
 - The coordination requirement that will be imposed on licensees is sufficient to protect legacy federal uses
 - Such a limitation would run counter to the 3GPP standards process and the AWS-1 limits
- Instead, the FCC should use the existing AWS-1 two-prong power limitation and coordination distance approach
 - **Power limitation:** “Fixed, mobile, and portable (hand-held) stations operating in the 1710-1755 MHz band are limited to 1 watt EIRP. Fixed stations operating in this band are limited to a maximum antenna height of 10 meters above ground. Mobile and portable stations operating in this band must employ a means for limiting power to the minimum necessary for successful communications.” 47 CFR 27.50(d)(4):
 - **Coordination distances:** various distances based on handset transmit power, see 47 CFR 27.1134.

Technical Rules (cont.)

- The FCC should not mandate the use of LTE
 - While LTE will likely be used in the band, the technology will evolve beyond current implementations and should not be proscribed
- Support interoperability between AWS-3 and AWS-1
 - The FCC should require interoperability for future AWS-3 devices
- Build out requirements should discount federal use
 - Areas not available to commercial licensee because of continued federal use should be excluded from requirements

License Sizes and Package Bidding

- Licenses should be based on 5x5 MHz blocks with a mix of geographic sizes
- The FCC should seek a balance of larger regional (EAs) and smaller market areas (CMAs)
- No package bidding

